

ATTACHMENT I:
PLAINTIFFS' VERDICT FORM

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

NICOLE JENNINGS WADE,
JONATHAN D. GRUNBERG, and
G. TAYLOR WILSON,

Plaintiffs,

v.

L. LIN WOOD,

Defendant.

Case No. 1:22-CV-01073

PLAINTIFFS' [PROPOSED] JURY VERDICT FORM

WE THE JURY answer the questions submitted to us as follows:

1. Have Plaintiffs proved by a preponderance of the evidence that Defendant L. Lin Wood acted at least negligently in accusing them of criminal extortion?

_____ Yes. We the jury find in favor of Plaintiffs Nicole Wade,
Jonathan Grunberg, and Taylor Wilson.

OR

_____ No. We the jury find in favor of Defendant L. Lin Wood.

2. If “yes,” as compensatory damages for defamation by libel, we the jury award to Plaintiffs the amount of \$_____.

If you checked “yes,” finding in favor of Plaintiffs with respect to Question 1, after answering Question 2, please proceed to Questions 3 through 4 below. If you checked “no,” finding in favor of Defendant with respect to Question 1, this ends your deliberations, and your foreperson should sign and date this verdict form.

3. Have Plaintiffs proved by a preponderance of the evidence that they are entitled to recovery of attorneys’ fees from Defendant L. Lin Wood?

_____ Yes OR _____ No

4. Have Plaintiffs Nicole Wade, Jonathan Grunberg, and Taylor Wilson proved by clear and convincing evidence that Defendant L. Lin Wood acted with actual malice in accusing them of criminal extortion?

_____ Yes OR _____ No

If you checked “yes,” finding in favor of Plaintiffs with respect to Question 4, please proceed to Questions 5 through 7 below regarding damages. If you checked “no,” finding in favor of Defendant with respect to Question 4, this ends your deliberations, and your foreperson should sign and date this verdict form.

5. As presumed damages for harm to reputation, we the jury award to Plaintiffs the additional amount of \$_____.

6. Have Plaintiffs proved by clear and convincing evidence that they are entitled to recovery of punitive damages from Defendant L. Lin Wood?

_____ Yes OR _____ No

7. Have Plaintiffs proved by a preponderance of the evidence that Defendant L. Lin Wood had a specific intent to cause harm when he published the defamatory statements about Plaintiffs?

_____ Yes OR _____ No

This ends your deliberations. Your foreperson should sign and date this verdict form.

SO SAY WE ALL.

Foreperson's Signature

Date: _____

Defendant will submit a proposed verdict form pursuant to the Court's Order (Doc. 101).